



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

OCT -6 2014

Kent Lindsay

Pittsburgh, PA 15241-2004

RE: Pre-MUR 567

Dear Mr. Lindsay:

The Federal Election Commission (the "Commission"), the regulatory agency that administers and enforces the Federal Election Campaign Act of 1971, as amended (the "Act"), has received information in the normal course of carrying out its supervisory responsibilities indicating that you may have violated provisions of the Act. Notification of this matter is being provided to you pursuant to the Commission's Agency Procedure for Notice to Respondents in Non-Complaint Generated Matters, published in the Federal Register on August 4, 2009 (74 Fed. Reg. 38,617).

Specifically, it has come to our attention that, in your former position as Chief Financial Officer of Mepco Holdings, LLC and certain affiliated entities ("Mepco"), you may have participated in an arrangement in which Mepco reimbursed you \$39,100 for federal campaign contributions, which took place between 2010 and 2012. The contributions are summarized below:

Name	Date	Amount	Aggregate	Election	Employer	Occupation
<b>Citizens for Altmire</b>						
Lindsay, Kent	8/22/2011	1,500.00	1,500.00	P2012	MEPCO LLC	CFO
Lindsay, Michelle	8/22/2011	1,500.00	1,500.00	P2012	N/A	Homemaker
<b>Capito for Congress</b>						
Lindsay, Kent A. Mr.	9/26/2010	\$500.00	\$500.00	G2010	MEPCO LLC	CFO
<b>Mark Critz for Congress</b>						
Lindsay, Kent A	9/14/2010	\$500.00	\$500.00	G2010	Mepco Inc	CFO
Lindsay, Kent A	10/29/2010	\$1,900.00	\$2,400.00	G2010	Mepco Inc	CFO
Lindsay, Michelle M	10/29/2010	\$1,000.00	\$1,000.00	G2010	N/A	Homemaker

Name	Date	Amount	Aggregate	Election	Employer	Occupation
Lindsay, Kent A	12/16/2010	\$1,000.00	\$1,000.00	P2012	Mepco Inc	CFO
Lindsay, Michelle M	12/16/2010	\$1,000.00	\$1,000.00	P2012	N/A	Homemaker
Lindsay, Kent A	7/10/2011	\$1,500.00	\$2,500.00	P2012	Mepco Inc	CFO
Lindsay, Michelle M	7/10/2011	\$1,500.00	\$2,500.00	P2012	N/A	Homemaker
<b>Manchin for West Virginia</b>						
LINDSAY, KENT	8/17/2010	\$1,000.00	\$1,000.00	P 2010	MEPCO	CFO
LINDSAY, KENT	4/10/2012	\$2,500.00	\$5,000.00	P2012	MEPCO	CFO
LINDSAY, KENT	4/10/2012	\$2,500.00	\$5,000.00	G2012	MEPCO	CFO
<b>Spike Maynard for Congress</b>						
Lindsay, Kent	10/22/2010	\$1,000.00	\$1,000.00	G2010	MepCo	CFO
<b>McKinley for Congress</b>						
LINDSAY, MICHELLE M	3/11/2010	\$500.00	\$500.00	P2010	N/A	HOMEMAKER
LINDSAY, KENT A	6/29/2010	\$1,000.00	\$1,000.00	G2010	MEPCO LLC	CHIEF FINANCIAL OFFICER
LINDSAY, MICHELLE M	6/29/2010	\$1,000.00	\$1,500.00	G2010	N/A	HOMEMAKER
Lindsay, Kent	3/31/2011	\$2,500.00	\$2,500.00	P2012	Mepco Llc	Chief Financial Officer
Lindsay, Michelle	3/31/2011	\$2,500.00	\$2,500.00	P2012	None	Homemaker
Lindsay, Kent	4/23/2011	\$2,500.00	\$5,000.00	G2012	Mepco Llc	Chief Financial Officer
<b>Mlnear for Congress</b>						
Lindsay, Michelle M.	3/17/2010	\$500.00	\$500.00	P2010	N/A	Homemaker
<b>Oliverio for Congress</b>						
Lindsay, Kent A.	3/11/2010	\$2,400.00	\$2,400.00	P2010	Mepco	Chief Financial Officer
Lindsay, Michelle M.	3/11/2010	\$2,400.00	\$2,400.00	P2010	None	Homemaker
Lindsay, Kent A.	6/28/2010	\$1,000.00	\$3,400.00	G2010	Mepco	Chief Financial Officer
Lindsay, Michelle M.	6/28/2010	\$1,000.00	\$3,400.00	G2010	None	Homemaker

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Name	Date	Amount	Aggregate	Election	Employer	Occupation
Lindsay, Kent A.	10/12/2010	\$1,400.00	\$4,800.00	G2010	Mepco	Chief Financial Officer
Lindsay, Michelle M.	10/12/2010	\$500.00	\$3,900.00	G2010	None	Homemaker
<b>Snuffer for Congress</b>						
LINDSAY, KENT	9/21/2012	\$1,000.00	\$1,000.00	G2012	MEPCO, LLC	CFO
	<b>Total</b>	<b>\$39,100.00</b>				

The Office of General Counsel is reviewing this information to determine whether to recommend to the Commission that there is reason to believe you may have knowingly and willfully violated 52 U.S.C. § 30122 (formerly 2 U.S.C. § 441f) by permitting your name to be used to effect contributions made in the name of another.

A "reason to believe" finding is not a finding that any person violated the Act; rather, it means only that the Commission believes a violation may have occurred. In the event the Commission finds that there is reason to believe, it may authorize the Office of General Counsel to conduct an investigation to determine whether, in fact, a violation occurred or to assess the scope of the alleged violation. *See* 52 U.S.C. § 30109(a)(2) (formerly 2 U.S.C. § 437g(a)(2)).

Before we make a recommendation to the Commission, we offer you the opportunity to provide a response in writing. Should you choose to respond, you may also submit any materials — including documents or affidavits from persons with relevant knowledge — that you believe may be relevant or useful to the Commission's consideration of this matter. The Commission will take into account any additional information you provide in determining whether to find reason to believe that you violated the Act or Commission regulations.

Your response, if you choose to make one, must be submitted in writing within 15 days of this letter's receipt. After 15 days, we will make our recommendations to the Commission. The Commission will then consider the recommendations and take appropriate action.

This matter will remain confidential in accordance with 52 U.S.C. §§ 30109(a)(4)(B) and 30109(a)(12)(A) (formerly 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A)), unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by legal counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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**Any correspondence sent to the Commission must be addressed as follows and should reference Pre-MUR 567:**

## Mail


**Federal Election Commission  
Office of Complaints Examination & Legal Administration  
Attn: Mary Beth deBeau  
999 E Street, NW  
Washington, DC 20436**

**Email**

**indebeau@fec.gov**

**If you have any questions, please contact me on our toll-free telephone number, (800) 424-9530. Our local telephone number is (202) 694-1650.**

**Sincerely,**

  
Jeff S. Jordan

**Jeff S. Jordan**  
**Assistant General Counsel**  
**Complaints Examination**  
**& Legal Administration**

**Enclosures:**

## Procedures

## Designation of Counsel Form